



STATE OF WASHINGTON  
WASHINGTON STATE BOARD OF HEALTH  
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January 14, 2004

**TO:** Washington State Board of Health Members  
**FROM:** Carl Osaki, WSBOH Member  
**RE:** **SCHOOL ENVIRONMENTAL HEALTH**

**Summary**

The Board has received extensive public testimony and heard presentations at past meetings on school environmental health issues, especially indoor air quality. At its July 2003 meeting, the Board passed a motion to begin revising the school environmental health rules, chapter 246-366 WAC, by July 2004. It also asked for an update at this January meeting from the Department of Health and the Office of the Superintendent of Public Instruction on their ongoing efforts to improve how Washington's public health and education agencies address school environmental health issues. Today the Board will hear from:

- Maryanne Guichard on DOH Environmental Health and Safety Program activities;
- Glen Patrick on the DOH Environmental Public Health Tracking Network activities around collection of school environmental health data; and
- Marcia Riggers on results from the OSPI/DOH School Environmental Health Initiative.

**Recommended Board Action**

*No action recommend at this time.*

**Discussion**

**Statutory Authority**

The Board has statutory authority under RCW 43.20.050(2)(c) to "adopt rules controlling public health related to environmental conditions including but not limited to heating, lighting, ventilation, sanitary facilities, cleanliness and space in all types of public facilities including...schools."

The Board sets minimal environmental standards for educational facilities in WAC 246-366. This rule requires that local health officers review and approve new facility and major alteration plans and make periodic inspections of each existing school within their jurisdictions (WAC 246-366-040). The rule does not indicate the frequency of inspection, how the inspections will be funded, or set specific criteria for evaluating indoor air quality (IAQ). The last revisions, adopted in 1991, added sound control standards. Local boards of health have authority to establish fees for school plan reviews and inspections (RCW 70.05.060). Statutory authority for school environmental health and determining construction and maintenance funding for school facilities lies with the State Board of Education, OSPI, district superintendents, and school boards (RCW 28A.315 through 335).

### Past Board Actions

In 1994, the Board adopted a motion on schools and school environments. This resulted in the Department of Health convening workgroups and producing several reports:

- School IAQ Best Management Practices Manual, February 1995
- Implementation Survey Report – WAC 246-366 Primary and Secondary Schools, February 12, 1997
- Health and Safety Guide for K-12 Schools in Washington, with OSPI, December 2000

At its October 2002 meeting, the Board heard presentations on OSPI's School Environmental Health Initiative, recommendations from the Healthy Schools Task Force (HSTF), the DOH Cle Elum-Roslyn High School Health Survey, the Cle Elum-Roslyn Indoor Air Quality Coalition, and School IAQ Program "best practices."

It also received a "Summary of Recommendations Regarding How to Improve the Public Health and School Systems' Responses to School IAQ Problems" compiled by staff. The Board appointed Carl Osaki, Vickie Ybarra, and Ed Gray, along with DOH representative Maryanne Guichard, to a workgroup charged with developing policy recommendations regarding school indoor air quality.

The workgroup presented its recommendation to the Board at its January 2003 meeting and the Board accepted those recommendations (see memo attached).

At its July 2003 meeting the Board heard a summary of the school environmental health rule review requested in January, and passed a motion to begin revising chapter 246-366 WAC by July 2004. It also directed the Chair to send a letter with specific recommendations to Mary Selecky, Secretary of Health, and Terry Bergeson, Superintendent of Public Instruction (see attached letter).

### Washington School IAQ

School indoor air quality has been a recurring topic during Board meetings over the last eight years. Over the last two years the Board has heard testimony from parents, students and teachers concerned about IAQ at Cle Elum schools. School IAQ problems are not limited to Cle Elum-Roslyn schools. Assessments of 156 Washington schools during the 2000-2001 school year found that 42.5 percent of classrooms had high carbon dioxide levels, indicating inadequate ventilation.

In 2002 OSPI received applications for Emergency School Repair and Renovation grants from 43 percent of school districts. More than \$25 million was requested, but the one-time federal funding provided only \$10.35 million. The applications provided information on the condition of many schools in the state. They also indicated that state and local funding of school repairs and renovations does not meet existing needs. (Please see [www.k12.wa.us/facilities/esrr/](http://www.k12.wa.us/facilities/esrr/) for more information.)

### Rule Review Timing

A 1998 DOH review of WAC 246-366 concluded that the rule should be revised. Almost all attendees at a March 24, 2003 School Environmental Health Rule Review meeting agreed that WAC 246-366 should be revised. Input on when the Board should revise the rule varied. Rule revisions such as this one require intensive staff work and generally take at least a year. Some LHJ representatives asked that revision of the school environmental health rules be delayed because of their limited capacity to participate in another rule revision process. The Board and DOH staff members who are most likely to lead this rule revision are also involved in other extensive rule revisions. The Board took this into consideration when it passed a motion to begin revising chapter 246-366 WAC by July 2004, when completion of other rule revisions is expected.